

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CA #:03 CV 12463 RGS

GREAT NORTHERN INSURANCE CO.
as subrogee of PHYLLIS MACNEIL
1000 Pillsbury Center
Minneapolis, MN 55402
Plaintiff

v.

INTERCITY ALARMS, INC.
20 North Main Street
Yarmouth, MA 02664
Defendant

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) AND 37.1(B)

I, A. Richard Bailey, counsel for plaintiff, hereby submit this Certification Pursuant to Local Rules 7.1(A)(2) and 37.1(B). On April 29, October 5, and November 23, 2004, I wrote Attorney Louison, counsel for defendant, Intercity Alarms, Inc. in an effort to have Defendant fully respond to Plaintiff's Requests for Admissions. Attorney Louison responded in letters dated May 3 and December 10, 2004, and he stated that Defendant was unable to respond to Plaintiff's Requests for Admissions because Defendant had no personal knowledge of the requested Admissions.

Notwithstanding the Plaintiff's reasonable and good faith effort to reach an agreement with opposing counsel with respect to Plaintiff's Requests for Admissions, no agreement has been reached and this motion is therefore required.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY, THIS 21st DAY OF DECEMBER, 2004.

s/ A. Richard Bailey
A. RICHARD BAILEY
Cozen O'Connor
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Philadelphia, PA 19107
215-665-2040
Counsel for Plaintiff